



**S**eattle's Ethics Code is a statement of our shared values:  
Integrity, Impartiality, Independence, and Transparency.

These shared values help us build and maintain an ethical culture in our workplaces and our business relationships. The foundation of the public's trust in our work, the Code is our written pledge that when we conduct City business, our allegiance is first and foremost to the people of Seattle.



# Going Out On a Limb

## CONFLICTS OF INTEREST PUT YOU IN A PRECARIOUS POSITION

It doesn't happen every day, or even every year, but sometimes our responsibilities as City employees could have an impact on our lives away from the workplace. In such a situation, ask yourself these questions:

*• Do I have a personal financial interest in a matter I'm supposed to be working on?*

*• Does someone in my immediate family, or someone who lives with me, have a financial interest in this matter?*

*• Does a business or non-profit that I serve as an officer, director, trustee, partner or employee have a financial interest in this matter, or does an organization*

*I'm seeking employment at, or have an arrangement for future employment with?*

*• Does someone who employed me in the last year, or someone who was a client of mine or my firm's in the past year, have a financial interest in this matter?*



If your answer to any of these questions is ever “yes,” you must disqualify yourself from working on the matter. One of the key values that underlines our Ethics Code is that we do our work impartially, without any conflict between our duties to the public and our personal interests. (There's a narrow exception for dealing with your past employers and past clients; get in touch with us if that's your situation, and we'll walk you through what you'll need to know before you participate in any actions that affect them.)

## Showing Your Roots

### IF THERE'S A QUESTION ABOUT A CONNECTION, DON'T TRY TO BURY IT.

What if you answer “no” to all of the questions about financial interests, but there is still something about your role in a project that might be questionable?

For example, what if you're serving on an interview panel and your sister's boyfriend is a candidate? He's been attending family celebrations and vacations for years; should you really be helping decide whether he gets a job in your department? Wouldn't your boss—or another person being interviewed—hit the roof if she knew about the relationship?

In these kinds of cases, another one of our treasured values—transparency—comes into play. Make a written disclosure to your department head and to the SEEC, putting all the facts on the table. Be open. Put it on the record that you have some connections that could cause someone to question your independence. Have a conversation with your supervisor, and a couple of outcomes are possible. They could decide that it's best for you to not be involved in the project, to keep the integrity of the process from being questioned. Or they could be comfortable with you participating, subject perhaps to some additional managerial oversight. Either way, what happens is a matter of public record.

If you or your supervisor want to consult with the SEEC about what to do, our office stands ready to assist you in making decisions that promote confidence in government.

## SOME TERMS YOU NEED TO KNOW

**W**hile acting ethically isn't rocket science, there are a couple of terms that you're going to need to know as you try to figure out whether you've got a conflict of interest.

**IMMEDIATE FAMILY** means your domestic partner/spouse; your child, child of a spouse/domestic partner; your sibling or a sibling of a domestic partner/spouse; brother-in-law, sister-in-law, parent or parent of a spouse/domestic partner, a person for whom you are a legal guardian; or someone you claimed as a dependent on your last tax return.

**PARTICIPATE** means to consider, investigate, advise, recommend, decide, approve, disapprove or take other similar action. It's important to remember that you don't have to make the final decision to potentially violate the Code. Even making a recommendation is subject to the Ethics Code.

**MATTER** means an application, submission, request for ruling, or other determination, permit, contract, claim, proceeding, case, decision, rulemaking, legislation or other similar action. It includes the preparation, consideration, discussion or enactment of administrative rules or legislation, but it does not include advice or recommendations regarding broad policies and goals.



## WHO SHOULD KNOW AND FOLLOW THE CODE?

**A**ll City employees, elected officials, members of boards and commissions, and volunteers are subject to the Ethics Code, as are City consultants, contractors and vendors who provide more than 1,000 hours of services to the City in a 12 month period. The Code uses the term “covered individual” when it refers to people subject to the law.

## Use It, Don't Abuse It

### CITY RESOURCES ARE ONLY TO BE USED FOR CITY BUSINESS

The Ethics Code provides assurances to taxpayers that City resources are being used for City purposes. Does that mean that you shouldn't make a dentist appointment from your work phone, or read a newspaper online at your lunch hour? Of course not. As long as you're delivering an honest day's work to the taxpayers, you don't need to be concerned about occasional use of your phone or computer for personal purposes. (However, you should learn and follow your department's policies, which may be more strict than the Ethics Code.)

These kinds of activities would violate the Ethics Code:

- *Using your City position to provide yourself or someone else with something that's not available to the public. For example, having a colleague write you a permit that wouldn't be available on the same terms to anyone else in Seattle.*

- *Using City resources to conduct a private business. If you've got a second job, make sure you do it on your own time, so*

*that the City isn't paying you to work for someone else. Make sure you're not using City facilities or equipment to conduct that second job. Even if you're using your own equipment, you shouldn't conduct a private business from your City work site.*

- *Using City resources for campaign purposes. Even if you're using your own equipment, you shouldn't do campaign work from your City work site.*

- *Using confidential information you learn through your City work for a non-City purpose.*

how will the public view the matter? Taking favors calls your integrity into question, reflecting poorly on you and the City.

Before you take anything from someone with whom you've got dealings at the City, it's best to check in with the SEEC. If you're involved in regulatory or contractual dealings with the person offering you lunch or tickets to a ballgame, you're probably going to have to decline. But if it's a small gift that you'll share with your coworkers, or the person offering you lunch isn't someone you've got official dealings with, then it's probably OK. But the rules are complex, so it's best to get advice before accepting gifts or anything of value.

## Keeping Your Values Priceless

### DON'T LET GIFTS AND FAVORS COMPROMISE YOUR INTEGRITY

Accepting favors from people you do City business with calls into question your ability to be impartial in your dealings with them. Are you going to come down hard on a contractor for missing a costly deadline when that contractor has just bought you lunch and let you use one of their Seahawks season tickets? Even if you are sure you won't let that interfere with your judgment,





# It Doesn't End With "Goodbye"

## EVEN IF YOU LEAVE, THE CODE STILL APPLIES

Whether you are retiring, going to a new job, or moving across the country, you still must keep the public trust. The City's Ethics Code provides assurances that City employees won't misuse their time at the City for their private gain or the private gain of others.

Rules to remember:

- *After you've gone, you can never divulge or use confidential information that you gained through your employment at the City of Seattle.*
- *For the first year after you leave, you cannot communicate with anyone at your old department on behalf of someone involved in a matter with the City.*
- *Also for the first year, you cannot participate in the competitive selection process for a city contract if while you were with the city you helped design the contract, the scope of work, or the process to be used in the selection of the contractor.*
- *Finally, for two years after you leave City employment, you cannot assist anyone on a matter in which you participated while with the City. Any help you could provide would likely qualify as a violation of the Ethics Code. To 'assist' means to act or offer to act in any way that helps, aids, advises, furnishes information or otherwise to provide assistance to another person believing that the assistance will be of use to another person and intending it to be of assistance.*

## A FAIR PROCESS

**W**hen the SEEC receives information suggesting that someone has violated the Ethics Code, staff conducts an investigation. The goal of the investigation is to develop a complete and accurate account of what happened.

At the close of that investigation, the Executive Director can either dismiss the case, or conclude that there was a violation and take further action. If the Executive Director determines that further action is required, the person under investigation can enter into a settlement of the charges with the Executive Director, or the SEEC can hold a hearing to determine whether there has been a violation.

At the close of the hearing, the SEEC can conclude that the Executive Director has failed to prove a violation, and dismiss the charges, or conclude that there was a violation, in which case the SEEC will set a penalty. SEEC decisions can be appealed to Superior Court.

## KNOWLEDGE IS POWER!

**T**he SEEC conducts regular trainings that are advertised through the Personnel Department. We're also happy to come to your office and discuss the Codes we administer with you or your entire team.

If you want to know more about the Ethics Code or the Whistleblower Protection Code, give us a call or stop by our office. If you'd like, you can review the Ethics Code yourself at SMC Chapter 4.16, or the Whistleblower Code at 4.20.800 through 4.20.860. You can also visit us at [www.seattle.gov/ethics](http://www.seattle.gov/ethics) or on the inweb at [inweb/ethics](http://inweb/ethics).

## WHO WE ARE, WHAT WE DO

**T**he SEEC is an independent City Commission that administers and enforces four codes covering Whistleblower Protection, Ethics, Elections, and Lobbying. The six member SEEC staff investigates allegations of wrongdoing, and provides advice and training to all levels of government. The Commission has the authority to impose fines for violations of the Ethics, Elections, and Lobbying Disclosure Codes.

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